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Attorney for Plaintiff

**DISTRICT COURT**

**CLARK COUNTY NEVADA**

EDGAR MARTINEZ-CARRANZA,

Plaintiff, vs.

PLUMBERS AND PIPEFITTERS UNION  
LOCAL NO. 525 TRUST FUNDS;  
PLUMBERS AND PIPEFITTERS LOCAL  
NO. 525 a union organized in Nevada;  
PLUMBERS AND PIPEFITTERS LOCAL  
NO. 525 PENSION & RETIREMENT  
FUNDS, a retirement fund established in  
Nevada; BOARD OF TRUSTEES OF THE  
PLUMBERS AND PIPEFITTERS LOCAL 525  
PENSION TRUST FUNDS, a pension fund  
established in Nevada; PLUMBERS AND  
PIPEFITTERS UNION LOCAL #525  
BENEFIT FUNDS,; TONI C. INSCOE  
ADMINISTRATOR FOR THE TRUSTEES  
PLUMBERS AND PIPEFITTERS  
NATIONAL PENSION FUND; BENESY  
INC.,; DOES I through V, inclusive; and ROE  
CORPORATIONS VI through X, inclusive,

Defendants

Case No.: 2:20-cv-01930-RFB-VCF

**STIPULATION TO EXTEND  
DEADLINE TO FILE RESPONSE AND  
REPLY TO MOTION TO DISMISS**

**(FIRST REQUEST)**

COMES NOW Plaintiff and the Plumbers and Pipefitters Union Local 525 Pension Plan (the "Pension Plan"), by and through their respective attorney of record file this Stipulation on the following terms:

The Pension Plan filed a Motion to Dismiss on January 29, 2021. (ECF No. 10.) Plaintiff's response is due on February 12, 2020. The parties agree to extend the time for Plaintiff to respond to February 22, 2020, which is an additional ten (10) days. The Parties also agree that the Pension Plan would have an additional ten (10) days to file any reply. Therefore the reply would be due March 11, 2021. This stipulation is not made for the purpose of delay, but rather Plaintiff requested additional time to accommodate his counsel's workload and schedule. This is the parties' first request to extend time to file responses regarding the Pension Plan's Motion to Dismiss.

Dated this 12th day of February, 2021.

**BROWNSTEIN HYATT FARBER  
SCHRECK, LLP**

/s/ Christopher M. Humes, Esq.

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Bryce C. Loveland, Esq.,  
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*Attorneys for the Plumbers and Pipefitters  
Union Local 525 Pension Plan*

Dated this 12th day of February, 2021.

**LAW OFFICES OF BYRON THOMAS**

/s/ Byron E. Thomas, Esq.

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Byron E. Thomas, Esq.  
Nevada Bar No. 8906  
3275 S. Jones Blvd., Ste. 104  
Las Vegas, Nevada 89146  
*Attorneys for Plaintiff*

IT IS SO ORDERED:

  
\_\_\_\_\_  
**RICHARD E. BOULWARE, II**  
**United States District Court**

DATED this 13th day of February, 2021.